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## IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

OTTO MAY, JR.,	)
Plaintiff,	)
,	) Case No. 02 C 50440
v.	)
	) Judge Frederick J. Kapala
CHRYSLER GROUP LLC,	) Magistrate Judge P. Michael Mahoney
Defendant.	)

## **Plaintiff's Proposed Voir Dire Questions**

Plaintiff, Otto May, Jr., by and through his attorneys, Karen J. Doran and Deanne S. Medina, submits the following proposed voir dire questions:

- 1. Have you or anyone close to you ever been a party to a lawsuit? What did the suit about? What was the outcome? How do you feel about that experience?
- 2. How have you been affected by the recent downturn in the economy (lost your job, your home, lifestyle changes)?
- 3. Your employment or self-employment information for the past 10 years, with such details as:
  - a. name and place of employment or self-employment;
  - title of your position, or a general description of your work activities and
    responsibilities; and
  - c. length of time of your employment, self-employment, or unemployment.
- 4. What do you think of unions? Do you or a close friend or family member belong to one now or have ever belonged?

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5. What are your major interests or hobbies – things you spend a great deal of time

on outside of work (e.g. clubs, groups, activities such as watching t.v.)?

6. What books, newspapers, and magazines do you subscribe to or regularly read?

7. Which radio programs you regularly listen to and which television programs you

regularly watch?

8. What organizations, clubs, or groups do you belong to?

9. Do you frequently use the Internet and, if so, which websites, blogs, or listservs

you regularly read, visit, or contribute to?

10. What legal training and experience (classes or on-the-job experience) do you

have?

11. Have you, any family member, or close fiend ever been accused of

discrimination?

12. Do you think that lawsuits are out of control in our country? Why or why not?

13. What do you think someone who believes that they are being discriminated

against should do about it?

14. Has anyone ever accused you or someone you know of harassing them on the job?

Explain. What was your reaction?

/s/Karen J. Doran	
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## **Proof of Service**

Karen J. Doran, an attorney, certifies that service of Plaintiff's Proposed Voir Dire Questions on Defendant's attorney, Stephen E. Balogh, Williams & McCarthy, 321 W. State St., Ste. 400, P.O. box 219, Rockford, IL 61105, was accomplished pursuant to ECF on Monday, August 16, 2010.

## s/Karen J. Doran

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